

Response to Heathrow's Airspace and Future Operations Consultation

2nd March 2019

1. Managing Noise for an Expanded Heathrow.

1a. Do you support our proposals for a noise objective?

No.

1b. Please provide any comments you have on our proposals for a noise objective: Heathrow's proposed noise objective is meaningless unless it is measurable and relevant to noise as it is actually experienced by residents.

The objective aims to deliver 'regular breaks' but does not commit to ensuring that these are predictable.

The objective also seeks to be 'proportionate and cost effective'. In our experience, this means that any such measures will be as cheap as possible. These terms are so vague as to be almost meaningless, and people should not presume they will receive any compensation, let alone adequate compensation.

1c. Please provide any other comments or suggestions you have on our proposed approach to developing a package of noise measures for an expanded Heathrow.

The proposals seek to maximise the number of flight movements over the most densely populated part of the UK. This is a fundamental problem and no amount of "mitigation" can get around it.

Both the proposed airspace changes and future airport expansion will result in more noise for local communities near to the airport. Communities further from the airport are also likely to experience more noise, though the planes may be slightly higher the further away they are from the airport. The proposed noise objective thus appears to be directly at odds with the impact that the proposed increase in flight numbers will have.

Indeed, depending on the precise alignment of the new flight paths, some communities will be experiencing noise for the first time. This will clearly increase the noise pollution endured by these communities. The maps provided by Heathrow do not clearly show which areas will get more noise. Precise flight paths should be published to show residents exactly what noise levels they will experience.

The most recent Government policy on noise states that the onset of community annoyance begins at 54dB (LAeq). It is vital that this metric is applied to the proposed changes as a minimum standard. Compensation and mitigation, that is at least as

comprehensive and financially generous as at any other major world airport, must be provided to all communities impacted.

The way noise measurement is averaged out is effectively meaningless. It is the single noise events that cause the disturbance. The WHO strongly recommends reducing average noise levels to below 45decibels as aircraft noise above this level is associated with raised blood pressure, cardio-vascular disease and stress. Protecting communities from aviation noise should always take priority over commercial interests.

Further, the impact of the proposed changes should be communicated directly and clearly, especially to those communities who will be newly overflowed. This consultation does not do this through the absence of a clear picture of the total impact of current noise levels compared to the impacts of the proposed arrivals and departures from IPAs.

2. Respite through runway and airspace alternation.

2a. Would you prefer to have longer periods of respite less frequently (all day on some days but no relief on other days) or a shorter period of respite (e.g. for 4-5 hours) every day?

Many of the communities we represent would suffer a reduction in the amount of respite under these proposals. Any such reduction in respite is unacceptable. It is invidious to make a choice between alternatives which both do harm to communities. The question is misleading as it presents the reduction in respite as inevitable.

2b. Please tell us the reasons for your preference.

It is not possible to answer this question without more information. It is difficult to know the full impact of the proposed runway and airspace alternation on specific communities without knowledge of the new flight paths or how alternation may operate.

2c. Please provide any other comments or suggestions you have on runway and airspace alternation.

Many communities who currently receive 'respite' from the noise are likely to see a significant reduction in the period when there are no planes overhead.

Communities at either end of the runway used for 'mixed mode' operations will potentially experience a significant loss of respite as they experience noise for a longer period, or if it's the new runway, will be subject to continuous operations for the first time.

It is difficult to know the full impact of the proposed changes because at this stage it is not clear where these new flight paths will be, nor how any alternation would be operated.

Further, there are no clear proposals for defining respite, monitoring respite periods, or for penalising for failure to adhere to respite. Neither of the respite periods proposed are long enough to prevent harm to health and there are no formal governance structures planned to enforce respite arrangements.

Predictable and consistent respite from aircraft noise is essential for our communities. We therefore oppose both the proposed 25,000 extra movements and any moves to reduce respite.

3. Directional Preference.

3a. Should we continue to prefer westerly operations during the day and easterly operations at night to reduce the total number of people affected by noise?

This question cannot be answered without a proper debate on the principles of fairness versus total societal impacts. To underpin this debate in respect of Heathrow airspace change, an analysis of impacts, including the economic cost of noise for different scenarios should be published.

3b. Please tell us the reasons for your answer

It is unclear which flight paths would be in place with an expanded Heathrow thus the real impact of this proposal remains unclear.

3c. Should we sometimes intervene to change the direction of arriving and departing aircraft to provide relief from prolonged periods of operating in one direction – even if that means slightly increasing the number of people affected by noise?

Response as per 3a above.

3d. Please tell us the reasons for your answer.

Response as per 3b above.

3e. Please provide any other comments or suggestions you have on directional preference.

The switching of direction of arriving and departing aircraft has impacts for all communities concerned. Moving from a Westerly preference to an Easterly preference, for example, would deliver a more balanced split between the communities impacted by noise.

However, it would result in an increase in the total number of people affected by aircraft noise as more planes would take-off and fly over central London. This would also result in new areas experiencing noise from arrivals for the first time and would also result in a loss of respite in those areas.

Westerly preference has been Government policy for decades and has been in place for safety reasons. Conventionally aircraft take off, and land, into the wind. The consultation does not explain what the safety implications of the proposed manged preference would be.

The ability to run a managed preference would result in a significant change to airport operations and potentially increase the noise impact for those communities immediately to the East and West of Heathrow.

It is unclear which flight paths would be in place with an expanded Heathrow, thus the real impact of this proposal remains unclear. It could well end up that despite the intention of minimising the impact of noise, that the use of managed preference results in an increase in the total number of people disturbed by aircraft operations.

Any changes to Heathrow's Directional Preference policy should include appropriate financial compensation for communities that will be impacted.

4. Night Flights.

4a. To help inform our consideration of the options, we want to know whether you would prefer for us to.

Until the precise flight paths are publicly available it is not possible to judge the total impact of the proposal.

4b. Please tell us the reasons for your preference:

The consultation says nothing about whether Heathrow proposes to change the time of the first daily departure. Thus, incomplete information has been provided and a fully informed judgement cannot be offered.

4c. Please provide any other comments or suggestions you might have on early morning arrivals:

The World Health Organisation (WHO) recommends 8 hours of undisturbed sleep and current operations prevent this for many communities already. It is not clear why this is not already in operation today.

The impact of using one runway for arrivals would mean a similar operation to today whereas the use of two runways could result in a dispersal of the flight paths and the spreading of noise. In theory this could mean some communities experiencing noise from early morning flights for the first time and other perhaps receiving a little more respite. However, the lack of detailed flight paths makes such a comparison impossible.

The night flight timings refer to the time at which the aircraft arrives at or leaves the stand, not when they land on, or take off from, the runway. A first arrival of 5.30am will mean that communities around the airport - and many far away from it - will still be experiencing noise as early as 5.00am. This is not evident in the consultation materials. Nor have the significant physical and mental health impacts been discussed in the consultation documents.

The consultation only considers "scheduled" flights, and does not appear to include not flights that are delayed. Equally, planes that arrive or take off late do not appear to be included in any suggested flight-free night period.

5. Other Night Restrictions

5a. Please provide any comments or suggestions on how we should encourage the use of the quietest type of aircraft at night (outside the proposed scheduled night flight ban).

Charges for the noisiest aircraft and for landing at night should be increased significantly. The setting and enforcement of these charges should be transferred from Heathrow to the new Independent Commission on Civil Aviation Noise. The revenue collected should be ring-fenced for improvements to community noise reduction measures.

5b. Please provide any other comments you have on night flights and restrictions.

It could be argued that even stricter restrictions on the use of the noisiest aircraft should be imposed at night. That only the newest and quietest planes be allowed to operate in this period.

There should be straightforward bans on the noisiest aircraft and for all other aircraft there should be noise-related landing and take-off charges which are sufficiently differentiated that they make a demonstrable difference to airline behaviour.

Further, local communities have long argued that charges for the noisiest aircraft are far too low to provide an incentive for airlines to switch to quieter aircraft. Therefore, the landing charges at night and those for the noisiest aircraft should be increased significantly.

Noise charges are sometimes revenue neutral. This means that noisier aircraft are penalised by paying a higher charge, but quieter aircraft receive the incentive of a discount. Overall, no extra revenue is produced. For night flights, all aircraft should pay an additional charge.

It should be the job of the new Independent Commission on Civil Aviation Noise to advise on the appropriate level. However, we suggest that the charges could be as much as ten times higher; with the revenue collected ringfenced for improvements to community mitigation measures.

Any operational bans or methods of “encouragement” require a formal governance structure. Therefore, limitations on operations must be formalised and no longer a voluntary option for Heathrow. This should include a mechanism for reducing over scheduling of flights late in the evening which has blighted the lives of communities for years.

6. Airspace Factors.

What sites or local factors should we be aware of in your area (or other area of interest to you), when designing flight paths for an expanded three-runway Heathrow?

Many of our members have concerns about the impact of the design envelopes on their local community, including the impact on open or public spaces and community buildings, as well as homes.

These proposals effectively seek to force far too many planes into too congested an airspace. The ultimate result of this is to play communities off against each other. The proposals neither limit or reduce noise and will harm the health and quality of life of communities irreparably.

Many communities have significant numbers of homes in conservation areas and thus do not have sufficient soundproofing to block out frequent plane noise.

All the options Heathrow gives for airspace arrangements with a third runway ignore the fact that a third runway would create even more noise, as well as more air pollution, more congestion and have a larger impact on climate change.

7. Independent Parallel Approaches.

What sites or local factors should we be aware of in your area (or other area of interest to you), when designing new arrival flight paths to make better use of our existing two runways?

The introduction of IPA at Heathrow may mean that many communities will be overflowed by both departing planes and arriving planes. Consequently, we oppose the introduction of IPA.

The impact of IPA would be to have number of concentrated flight paths with a very high number of flights overhead. This is likely to result in significantly more noise for the communities directly underneath, indeed the Civil Aviation Authority (CAA) have described the impact as effectively creating a "noise canyon".

By offsetting the approaches, the likelihood is that respite for the people underneath the inward flightpaths will be substantially reduced.

Many communities are already severely impacted and won't receive runway alternation for several years. Any expansion only exacerbates the damage done to health by aircraft noise and pollution and is incompatible with climate change targets.

We also have concerns that the proposals for IPA have not received any Parliamentary scrutiny as they did not form part of the Airports NPS.

Further, it is not evident that any assessment has been undertaken on the impacts of the 25,000 additional movements in terms of noise, air pollution, health or congestion on local transport networks.

8. Other Airspace Elements.

Please provide any other comments you have relating to the airspace elements of the consultation.

The proposed changes don't appear to take any account of air traffic into and out of other airports and heliports. The airspace of the entirety of the South East of England is being redrawn and the consultation makes little attempt to explain how the proposals would fit in with this.

The concentration of flight paths seems to impose an unfair burden upon those already blighted by aircraft noise.

The information presented is very confusing as it stands and it is impossible to provide meaningful responses. It is hard not to conclude that this is not deliberate, given the ample resources Heathrow seems to have for this exercise.

In particular, the following is absent from the consultation:

- a composite picture showing for each postcode the whole impact of existing flight paths plus new flight paths in one view.
- precise details of the proposed new flight paths.

As far as we are aware most members of the public have emerged from exposure to the consultation materials baffled and anxious when the objective should have been to render them better informed. Completion of online form has proved onerous and confusing, resulting in partially completed responses. The lack of a review mechanism before respondents submit their answers is a strange omission. Further, the options provided in the consultation significantly constrained the ability for respondents to share their real views.

9. Further Comments.

Having considered everything within the consultation, do you have any other comments?

The proposals in the consultation are very technical and require a high level of expertise to interpret. Owing to the absence of precise flight paths and comparative maps for existing aircraft operations, the real impact of the proposals on the community remains unclear.

The social impact and health costs of the increase in pollution from the expansion proposals must be properly assessed, published and debated thoroughly.

We believe that Heathrow should already have implemented a range of mitigation measures to improve the quality of the environment for the many people already affected by its activities. These include:

- predictable and consistent respite from aircraft noise;
- a night flight ban of a minimum of 8 hours;
- and a meaningful ban on noisier plans.

That Heathrow Airport is only promising limited mitigation measures in exchange for a huge expansion and this overall deterioration of the quality of life of communities is not indicative of an organisation acting in good faith.

10. Consultation Feedback.

Please give us your feedback on this consultation (such as the documents, website or events).

The consultation documents were too complex and technical for non-aviation experts to easily understand. They also lacked sufficient detail to tell communities exactly how they would be affected by the proposed changes.

The consultation is defective as it does not draw residents' attention to issues such as traffic congestion, air pollution and climate change. This is potentially misleading people into thinking that the only issue they need to worry about, in relation to these proposals, is noise.

There is no reference to the impact of the proposals on air pollution in the main consultation documents. The proposals will surely have a significant impact on air pollution, particularly given the size of the increase in the number of planes, the effect of having a flight path overhead and the low levels at which planes will be flying. If there were, in fact, no such impacts we would expect the main consultation documents to clearly demonstrate how this is the case.

There is also no mention of climate change in the main consultation documents. This is inexplicable since there will be increased carbon emissions from the additional flights and also the proposed changes to the flight paths. It is not clear why there is no discussion of this in the consultation documents. We can only infer that these impacts would be very worrying to members of the public and therefore inconvenient for the case for the third runway.

The consultation has also failed in its communication attempts. This is attributable to the volume of proposals; the interactions between issues; the complexity of the trade-offs; the unclear relationship between the proposals and the current "baseline" situation; the attempt by questions to manipulate residents into making choices to the detriment of others; the absence of criteria to be used to assess any final proposals.